

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel, W.A. DREW EDMONDSON, in his capacity as ATTORNEY GENERAL OF THE STATE OF OKLAHOMA and OKLAHOMA SECRETARY OF THE ENVIRONMENT C. MILES TOLBERT, in his capacity as the TRUSTEE FOR NATURAL RESOURCES FOR THE STATE OF OKLAHOMA,

Plaintiffs,

v.

TYSON FOODS, INC., et al.,

Defendants.

Case No. 4:05-CV-329-TCK-SAJ

**MOTION FOR ADMISSION OF MICHAEL R. BOND
AS COUNSEL *PRO HAC VICE***

Defendants, Tyson Foods, Inc., Tyson Chicken, Inc., Tyson Poultry, Inc., and Cobb-Vantress, Inc. (collectively “Tyson”), by their attorneys, Ryan, Whaley & Coldiron, P.C., move this Court pursuant to LCvR 83.2(g) and 83.3 for the admission of Michael R. Bond to appear *pro hac vice* in this case as out-of-state counsel for Tyson. In support of this Motion, Tyson states the following:

1. The undersigned Paula M. Buchwald, is a member of the bar of this Court and is counsel of record for Defendants Tyson Foods, Inc., Tyson Poultry, Inc., Tyson Chicken, Inc., and Cobb-Vantress in these proceedings. Paula M. Buchwald will continue to serve as counsel for Defendant Tyson in these proceedings.

2. Pursuant to LCvR 83.2(g), attached to this Motion as Exhibit 1 is the completed Request for Admission *Pro Hac Vice* form of Michael R. Bond.

3. Michael R. Bond is a member in good standing of the bar of Arkansas. *See* Exhibit 1.

4. The proposed admittee understands that, upon admission *pro hac vice*, he shall be subject to the disciplinary jurisdiction of this Court.

5. The proposed admittee understand that admission *pro hac vice* is for this case only and does not constitute formal admission to the bar of this Court.

6. Submitted contemporaneously with the filing of this Motion is tender of the required \$75.00 fee to the Clerk of this Court.

WHEREFORE, Defendants, Tyson Foods, Inc., Tyson Chicken, Inc., Tyson Poultry, Inc., and Cobb-Vantress, Inc. respectfully request that this Court grant this application for out-of-state attorney Michael R. Bond to appear *pro hac vice* before this Court on behalf of Defendants, Tyson Foods, Inc., Tyson Chicken, Inc., Tyson Poultry, Inc., and Cobb-Vantress, Inc. and enter the proposed Order submitted herewith.

Respectfully submitted,

/s/ Paula M. Buchwald

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**COUNSEL FOR DEFENDANTS TYSON
FOODS, INC., TYSON CHICKEN, INC.,
TYSON POULTRY, INC. and COBB-
VANTRESS, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of October, 2006, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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Bruce Jones	
Jay Thomas Jorgensen	
Raymond Thomas Lay	
Nicole Marie Longwell	
Linda C. Martin	
Archer Scott McDaniel	
Robert Park Medearis, Jr.	
James Randall Miller	

and I further certify that a true and correct copy of the above and foregoing will be mailed via regular mail through the United States Postal Service, postage properly paid, on the following who are not registered participants of the ECF System:

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